

Dallas W. Jolley
Attorney at Law
4707 South Junett St., Suite B
Tacoma, WA 98409
Office (253) 761-8970
Fax (253) 761-7910

The Honorable Judge Alston
Chapter 13
Hearing Date: January 14, 2016
Hearing Time: 9:30 am
Hearing Location: Courtroom 7206
700 Stewart St. #7206
Seattle, WA 98101-8101

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF WASHINGTON**

In re:

JEREMY ROBERT WEIKERT,

Debtor.

Case No.: 15-16564-CMA

CHAPTER 13

DEBTOR'S RESPONSE TO OBJECTION TO
CONFIRMATION

COMES NOW, the Debtor through his attorney enter this response to the
Chapter 13 Trustee's objection to confirmation, and states the following:

1. Debtor has filed an amended plan that increases his plan payment to \$2,000.00 per month to pay 100 percent of his debts as had his initial plan. This amended plan payment amount should pay 100 percent as promised by this plan. Except for the income tax debt, which was unknown because of unfiled tax returns, the other creditor's balances due were taken from his November 3, 2015 credit report, which should be a good gauge of the amounts of the claims. The large unknown debt stemmed from unfiled tax returns, and now that Debtor has filed his tax returns, the Internal Revenue Service has filed its final income tax claim, and considering the other claims filed, the \$2,000.00 monthly plan payment should pay 100 percent. Debtor's Schedule I minus Schedule J results in sufficient funds being available For Debtor to afford the \$2,000.00 per month plan payment.

DEBTOR'S RESPONSE TO OBJECTION TO
CONFIRMATION FILED BY THE CHAPTER 13 TRUSTEE
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2. Trustee should amend the wage order so that sufficient funds will come into the plan each pay period from the Debtor's wages, as there are sufficient monies available to make the Debtor's plan payment. If there is a shortfall Debtor agrees to increase his monthly payment accordingly.

THEREFORE, for the above reasons, the Debtor requests that the Court reject the Trustee's objection and confirm his amended plan dated January 12, 2016.

Dated this 12th Day of January, 2016.

/s/ Dallas W. Jolley
Dallas W. Jolley WSBA# 22957
Attorney for Debtor
4707 South Junett Street, Suite B
Tacoma, WA 98409
Tel. (253) 761-8970 FAX (206) 686-7653